UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

VEN AIR UNLIMITED COMPANY,

Plaintiff,

v.

GENERAL DYNAMICS CORPORATION,

Defendant.

Civil Case No. 1:20-cv-03091 (MHC)

GENERAL DYNAMICS' NOTICE OF MOTION TO DISMISS AND/OR STAY PROCEEDINGS PENDING ARBITRATION

PLEASE TAKE NOTICE that Defendant General Dynamics Corporation ("GD") will respectfully move this Court pursuant to Federal Rule of Civil Procedure 12(b)(1) to dismiss the above-referenced actions without prejudice and/or stay the proceedings pending resolution of ongoing arbitration proceedings.

Respectfully Submitted,

s/ Shawn A. Kachmar

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CERTIFICATE OF SERVICE AND COMPLIANCE WITH FONT SIZE AND TYPE

I hereby certify that the foregoing document was prepared using Times New Roman 14 point type as required by Local Rule 5.1(C).

I further certify that I electronically filed the foregoing with the Clerk of Court using the CM/ECF systems which will automatically send email notification of such filing to all counsel of record.

Respectfully submitted this 28th day of July, 2020.

s/ Shawn A. KachmarShawn A. KachmarGeorgia Bar No. 405723